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3 District of Nevada
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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LISA KEITH,
Plaintiff,
v.
NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
Defendant.)
Case No. 2:18-cv-01110-JAD-VCF
)
)
)
**JOINT STIPULATION FOR EXT
TIME AND ORDER**
)
(Third Request)
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IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from January 16, 2019 to **January 17, 2019**. This is Defendant's third request for extension. Good cause exists to grant Defendant's request for extension. Counsel has chronic migraines, which impair her vision and had a migraine on the date of the current filing deadline. While Counsel for Defendant diligently attempted to finish her response, Counsel could not complete it due to her migraine and impaired vision. Due to Counsel's unexpected health issue, Counsel needs additional time to adequately review the transcript and properly respond to Plaintiff's Motion for Summary Judgment. Defendant makes this request in

1 good faith with no intention to unduly delay the proceedings. The parties further stipulate that the
2 Court's Scheduling Order shall be modified accordingly.

3 Respectfully submitted,

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5 Dated: January 16, 2019

/s/ Cyrus Safa

(*as authorized by email on January 16, 2019)
6 CYRUS SAFA
7 Attorney for Plaintiff

8 Dated: January 16, 2019

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10 DAYLE ELIESON
11 United States Attorney

/s/ Tina L. Naicker

TINA L. NAICKER
12 Special Assistant United States Attorney

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14 **APPROVED AND SO ORDERED:**

15 DATED: 1-17-2019



16 THE HONORABLE CAM FERENBACH
17 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, TINA L. NAICKER, certify that the following individual was served with a copy of the

JOINT STIPULATION FOR EXTENSION OF TIME AND [PROPOSED] ORDER

on the date and via the method of service identified below:

CM/ECF:

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Attorneys for Plaintiff

Respectfully submitted this 16th day of January 2019,

/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney